

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE LUIS ROSARIO PEREZ

DEBTOR

CASE NO 18-06720 BKT

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S OBJECTION TO
PROPOSED PLAN CONFIRMATION UNDER 1325**
DOCKET NO. 15

TO THE HONORABLE COURT:

COMES NOW, JOSE LUIS ROSARIO PEREZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Objection to Proposed Plan Confirmation Under 1325*, Docket No. 15, objecting the confirmation of Debtor's proposed Chapter 13 Amended Plan (Docket No. 11), basically stating that the Debtor's proposed Plan is "insufficiently funded" to pay 100% of priority claims, that the Debtor has failed to submit evidence of maintaining direct post-petition DSO payments up-to-date (evidence previously submitted up-to January/2019) and that the Debtor's Non-Filing Spouse's ("NFS's) income is greater than the one initially disclosed by the Debtor and that the same must be amended to include the correct amount of the NFS's income. *Trustee's Objection to Proposed Plan Confirmation Under 1325*, Docket No. 15.

2. The Debtor respectfully states that on March 01, 2019 the Debtor filed an *Amended Chapter 13 Plan*, Docket No. 16, and also filed *Amended Schedules I & J*, Docket No. 17, whereby the "insufficiently funded" issue was cured by increasing the proposed Plan base to \$24,810.00.

3. The Debtor also filed amended "income and expenses" schedules (I & J), Docket No. 17, in order to evidence the correct amount received by the Debtor's NFS and to increase the Debtor's disposable income to comply with the terms of the proposed *Amended Chapter 13 Plan*, Docket No. 16.

4. Furthermore, on March 01, 2019, the Debtor submitted to the Chapter 13 Trustee (uploaded to the Trustee's system) evidence of the DSO February/2019 payment by way of

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a copy of the ASUME receipt for February/2019. The Debtor is current in his DSO post-petition payments and is up-to-date in his Plan payments to the Chapter 13 Trustee.

5. The Debtor hereby respectfully responds to the Trustee's objection to Plan confirmation, Docket No. 15, in the above captioned case.

WHEREFORE, the Debtor respectfully prays that Trustee's objection to Plan confirmation Docket No. 15, be denied and the Debtor's proposed Chapter 13 Amended Plan, Docket No. 16, be confirmed.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participant: Debtor, Jose Luis Rosario Perez, RR 36 Box 7524 San Juan PR 00926, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 02nd day of March, 2019.

/s/Roberto Figueroa Carrasquillo
USDC #203614
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